

Approved, SCAO

Original : Court  
1st Copy : Defendant2nd Copy - Plaintiff  
3rd Copy - ReturnSTATE OF MICHIGAN  
THIRD JUDICIAL CIRCUIT  
WAYNE COUNTY

## SUMMONS

CASE NO.  
19-001309-NF  
Hon. Martha M. Snow

Court address : 2 Woodward Ave., Detroit MI 48226

Court telephone no.: 313-224-6889

Plaintiff's name(s), address(es), and telephone no(s)

Dobbins, Trivly

v

Defendant's name(s), address(es), and telephone no(s).

Greyhound Lines, Inc.

Plaintiff's attorney, bar no., address, and telephone no

James Raymond Ekleberry 78222  
25899 W 12 Mile Rd Ste 200  
Southfield, MI 48034-8342

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

## Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. Attached is a completed case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

## Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ \_\_\_\_\_ Court,

where it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_.

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS

## NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to file a written answer with the court and serve a copy on the other party or take other lawful action with the court (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date  
1/28/2019Expiration date\*  
4/29/2019Court clerk  
Tashia Marshall

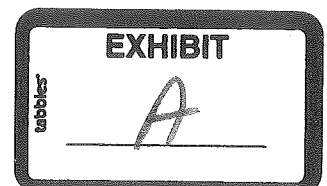
Cathy M. Garrett- Wayne County Clerk.

\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

MC 01 (8/18)

SUMMONS

MCR 1.109(D), MCR 2.102(B), MCR 2.104, MCR 2.105



**SUMMONS**  
Case No. : 19-001309-NF

**PROOF OF SERVICE**

**TO PROCESS SERVER:** You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

**CERTIFICATE / AFFIDAVIT OF SERVICE / NONSERVICE**

☐ **OFFICER CERTIFICATE**

**OR**

☐ **AFFIDAVIT OF PROCESS SERVER**

I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104[A][2]), and that: (notarization not required)

Being first duly sworn, I state that I am a legally competent adult who is not a party or an officer of a corporate party, and that: (notarization required)

☐ I served personally a copy of the summons and complaint.

☐ I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint, together with \_\_\_\_\_

List all documents served with the Summons and Complaint

\_\_\_\_\_ on the defendant(s):

Defendant's name	Complete address(es) of service	Day, date, time

☐ I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service.

Defendant's name	Complete address(es) of service	Day, date, time

I declare under the penalties of perjury that this proof of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled \$	Fee \$	
Incorrect address fee \$	Miles traveled \$	Fee \$	Total fee \$

Signature \_\_\_\_\_

Name (type or print) \_\_\_\_\_

Title \_\_\_\_\_

Subscribed and sworn to before me on \_\_\_\_\_, \_\_\_\_\_ County, Michigan.

My commission expires: \_\_\_\_\_ Date

Signature: \_\_\_\_\_

Deputy court clerk/Notary public

Notary public, State of Michigan, County of \_\_\_\_\_

**ACKNOWLEDGMENT OF SERVICE**

I acknowledge that I have received service of the summons and complaint, together with \_\_\_\_\_

Attachments

on \_\_\_\_\_

Day, date, time

on behalf of \_\_\_\_\_

Signature \_\_\_\_\_

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

TRIVLY DOBBINS,

Plaintiff,

vs.

Case No. 19- NF  
Hon.

GREYHOUND LINES, INC., a foreign  
corporation,

Defendant.

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WIGOD & FALZON, P.C.  
LAWRENCE C. FALZON (P30655)  
JAMES R. EKBERRY (P78222)  
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[pat@falzonlaw.com](mailto:pat@falzonlaw.com)

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There is no other pending or resolved civil action arising out  
of the transaction or occurrence alleged in this Complaint.

*Lawrence C. Falzon*

Lawrence C. Falzon

COMPLAINT

NOW COMES the above named Plaintiff, by and through her attorneys, WIGOD & FALZON, P.C., and complaining against the Defendant, a foreign corporation, respectfully represents unto this Honorable Court as follows:

19-001309-NF FILED IN MY OFFICE Cathy M. Garrett WAYNE COUNTY CLERK 1/28/2019 10:59 AM Tashia Marshall

JURISDICTIONAL AVERMENTS

1. That the Plaintiff is a resident of the City of Ypsilanti, County of Washtenaw, State of Michigan.
2. That the Defendant is a foreign corporation, licensed by the State of Michigan to conduct business in the State and conducts continuous and systematic business in the City of Detroit, County of Wayne, State of Michigan.
3. That upon information and belief, the amount in controversy exceeds Twenty-Five Thousand (\$25,000.00) Dollars, exclusive of costs, interest and attorney fees.
4. That the incident giving rise to this cause of action occurred in the City of Detroit, County of Wayne, State of Michigan.

COUNT I

5. That on February 15, 2018, the Plaintiff was a passenger on Defendant's bus, in the City of Detroit, County of Wayne, State of Michigan.
6. That at that said time and place, there existed a policy of automobile insurance issued by the Defendant and covering the Plaintiff, as a passenger on its bus, for all allowable personal protection insurance benefits as provided by the Michigan No-Fault Act, said policy of insurance having been written under the terms of Public Act No. 294 of the Public Acts of 1972, being commonly known as the Michigan No-Fault Law.
7. That as a result of the aforementioned automobile accident, the Plaintiff incurred reasonable and necessary expenses as provided for in the Michigan No-Fault Act, M.C.L.A. 500.3101, *et seq.*

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8. That pursuant to the appropriate statutes and the subject insurance policy, Plaintiff made timely application to Defendant, through its employees and agents for payments of her No-Fault benefits as provided by the policy and the Michigan No-Fault Law under Claim Number 002456-497803-AN-01.

9. Despite the above-stated requests, the Defendant has neglected and refused to pay the No-Fault benefits now due and owing to and/or on behalf of Plaintiff, despite the fact that said payments have been repeatedly demanded from the Defendant.

WHEREFORE, Plaintiff prays that this Honorable Court enter a judgment against the Defendant pursuant to the Michigan No-Fault Act, MCL 500.310 *et. seq.*, in the total amount found to be due and owing at the time of trial, as provided by the No-Fault Law, plus court costs, statutory interest of twelve (12%) percent and actual attorney fees sustained in this case.

WIGOD & FALZON, P.C.

BY: Lawrence C. Falzon  
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Dated: January 28, 2019